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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

U.S. EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION,

Plaintiff,

vs.

LIBERTY CHRYSLER, JEEP, DODGE LLC,  
INTERNET AUTO RENT & SALES OF LAS  
VEGAS INC., INTERNET AUTO RENT &  
SALES INC.

Defendants.

Case No.: 3:15-cv-00232-HDM-VPC

**STIPULATION TO EXTEND  
SCHEDULED DEADLINES AND  
[PROPOSED] ORDER**

**(Second Request)**

Pursuant to Local Rule 26-4 and as referenced in the Parties' Joint Case Management Report  
(ECF #66), Plaintiff U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION (hereinafter  
"Plaintiff" or "EEOC") and Defendants LIBERTY CHRYSLER, JEEP, DODGE LLC, INTERNET

1 AUTO RENT & SALES OF LAS VEGAS INC., and INTERNET AUTO RENT & SALES INC.  
2 (hereinafter collectively "Defendants") respectfully request an extension of two deadlines: the  
3 deadline for the disclosure of expert witnesses and deadline for the disclosure of rebuttal experts.  
4 All other deadlines will remain the same.

5 (a) and (b) As discussed in detail in the Parties' Stipulation to Extend Scheduled Deadlines  
6 and [Proposed] Order (ECF #50), the Parties have been diligent in discovery in light of the Court's  
7 discovery schedule. Written discovery has been exchanged and multiple depositions have been  
8 taken and scheduled.

9  
10 (c) The discovery matter at issue pertains to the disclosure of expert witnesses and the  
11 disclosure of rebuttal experts. Currently, the deadline for the disclosure of expert witnesses is  
12 February 1, 2016, and the deadline for the disclosure of rebuttal experts is March 2, 2016. The  
13 EEOC has secured an economic expert for this case, and Ms. Shara Rynearson's testimony may be  
14 dispositive to the expert's analysis.

15 For reasons outside of the Parties' control, the deadlines for the expert and rebuttal reports  
16 may not be met. The Court approved the stipulated protective order on Ms. Rynearson's medical  
17 records on November 23, 2015 (ECF #60). Defendants issued their subpoenas duces tecum to Ms.  
18 Rynearson's medical providers in order to obtain medical records and information in early  
19 December 2015. Defendants anticipate obtaining these records in late December 2015 and early  
20 January 2016. Because Defendants would like Ms. Rynearson's medical and employment records  
21 prior to deposing her, they have vacated and rescheduled Ms. Rynearson's deposition to the end of  
22 January or the beginning of February 2016. Without Ms. Rynearson's testimony, the EEOC's expert  
23 may not be able to complete his report by the current deadline of February 1, 2016.

24  
25 (d) Proposed Schedule: To allow the parties sufficient time to complete discovery, the  
26 Parties hereby stipulate and respectfully request that the Court continue two deadlines by thirty (30)  
27 days:

28 **Disclosure of expert witnesses: From February 1, 2016 to March 3, 2016**

**Disclosure of rebuttal experts:** From March 2, 2016 to March 31, 2016<sup>1</sup>

**All other deadlines will remain the same:**

Discovery cut-off: March 31, 2016

**Dispositive motions deadline: May 2, 2016**

**Joint pretrial order deadline: May 31, 2016**

IT IS SO STIPULATED.

**Dated: December 17, 2015**

**U. S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION**

By: /s/ Sirithon Thanasombat  
SIRITHON THANASOMBAT  
Attorney for Plaintiff EEOC

**Dated: December 17, 2015**

**LEWIS ROCA ROTHGERBER LLP**

By: /s/ Scott Hoffmann  
SCOTT HOFFMANN  
Attorney for Defendants

**IT IS SO ORDERED.**

Dated: December 23, 2015

  
HON. VALERIE P. COOKE  
United States District Court Magistrate Judge

<sup>1</sup> The Parties further stipulate that depositions of the rebuttal expert(s) shall be completed by April 15, 2016.

**CERTIFICATE OF SERVICE**

I am, and was at the time the herein service took place, a citizen of the United States, over the age of eighteen (18) years and not a party to the above-entitled cause.

I am employed in the Legal Unit of the San Francisco District Office of the United States Equal Employment Opportunity Commission.

My business address is Equal Employment Opportunity Commission, San Francisco District Office, 450 Golden Gate Avenue, 5 West, P.O. Box 36025, San Francisco, CA 94102.

On the date that this declaration was executed, as shown below, I served the following document:

**☐ STIPULATION TO EXTEND DEADLINES AND [PROPOSED] ORDER**

by email on the following person(s):

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I declare under penalty of perjury that the foregoing is true and correct. Executed on December 17, 2015, at San Francisco, CA.

//s/ Sirithon Thanasombat  
Sirithon Thanasombat